

**REDACTED—UNREDACTED VERSION TO BE FILED UNDER SEAL**

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Group, LLC, et als*

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

HEALTH CARE SERVICES GROUP, INC.,

Plaintiff,

v.

SKYLINE SERVICES GROUP, LLC, et als.

Defendants.

**Case No.: 17-cv-02703**

Honorable Joel H. Slomsky

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**PETITION FOR LEAVE TO WITHDRAW AS COUNSEL  
FOR DEFENDENTS, SKYLINE SERICES GROUP, LLC, ET ALS.**

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The undersigned counsel, Kevin J. O'Connor, Esquire of the law firm of Peckar & Abramson, P.C., hereby seeks leave to withdraw his appearance and that of the law firm on behalf of Defendants Skyline Services, LLC, et al. ("Defendants") and for a Thirty-Day Stay and Protective Order to Permit Defendants to Retain Alternate Counsel. In support of this Petition, counsel states:

1. On or about June 15, 2017, Plaintiff Health Care Services Group, Inc. initiated this matter by filing its Complaint against 99 defendants, including 73 entity defendants and 26 individual defendants.

2. On or about September 25, 2017, prior counsel, William Whitman, Esq., sought leave from this Court to withdraw his previously filed appearances on behalf of 23 of the 26 individual defendants.

3. On or about October 17, 2017, this Court granted Whitman's motion to withdraw as counsel for 23 of the 26 individual defendants.

4. On or about May 10, 2018, Whitman filed a petition for leave to withdraw as counsel for the remaining defendants, including 73 entity defendants and 3 individual defendants, Joseph Schwartz, Michael Schwartz, and Louis Schwartz.

5. This Court granted Whitman's petition for leave to withdraw as counsel on or about June 20, 2018.

6. Following Whitman's withdrawal as counsel, Peckar & Abramson, P.C. was retained to represent the 73 entity defendants and 3 individual defendants.

7. Peckar & Abramson, P.C. filed a notice of appearance on or about July 12, 2018.

8. [REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED]

11. [REDACTED]

THEREFORE, the undersigned counsel and Peckar & Abramson, P.C. request that the Court enter an Order permitting counsel to withdraw his and the law firm's appearance on behalf of the Defendants and granting a Thirty-Day Stay and Protective Order to Permit Defendants to Retain Alternate Counsel.

Respectfully submitted,

/s/ Kevin J. O'Connor

Kevin J. O'Connor, Esquire

Attorney I.D. #310260

**Peckar & Abramson, P.C.**

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*Attorneys for Defendants' Skyline Services  
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Dated: January 18, 2019

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on January 18, 2019, a true and correct copy of the foregoing was filed and served via CM/ECF on all counsel of record.

By: /s/ Kevin J. O'Connor  
Kevin J. O'Connor, Esquire